REMARKS

This is a full and timely response to the non-final Office Action of October 18, 2005. Reexamination, reconsideration, and allowance of the application and all presently pending claims are respectfully requested.

Upon entry of this Third Response, claims 1-28 are pending in this application. Claims 24-28 are newly added via the amendments set forth herein, and it is believed that such amendments add no new matter to the present application.

Response to §103 Rejections

In order for a claim to be properly rejected under 35 U.S.C. §103, the combined teachings of the prior art references must suggest all features of the claimed invention to one of ordinary skill in the art. See, *e.g.*, *In Re Dow Chemical Co.*, 837 F.2d 469, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 642 F.2d 413, 208 U.S.P.Q. 871, 881 (C.C.P.A. 1981). In addition, "(t)he PTO has the burden under section 103 to establish a *prima facie* case of obviousness. It can satisfy this burden only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references." *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988) (citations omitted).

Claim 1

Claim 1 presently stands rejected under 35 U.S.C. §103 as allegedly unpatentable over

Hayes (U.S. Patent No. 6,339,826) in view of *Shrader* (U.S. Patent No. 6,009,475). Claim 1

presently reads as follows:

> 1. A computer system, comprising:
> memory; and
> a security application configured to display a list of security rules for
> locking down resources of said computer system, said security application
> configured to enable a set of said security rules, based on inputs from a user, and to
> cause said computer system to enforce said enabled set of security rules by
> modifying a machine state of said computer system, *said security application*
> *further configured* to enable said user to select one of said security rules and *to*
> *display information describing said selected rule in response to a selection of said*
> *one rule from said displayed list by said user*, said information based on data
> stored in said memory. (Emphasis added).

Applicants respectfully assert that the combination of *Hayes* and *Shrader* fails to suggest at least

the features of claim 1 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 1 is

improper.

In rejecting claim 1, it is candidly admitted in the Office Action that *Hayes* fails to disclose

"said security application further configured to enable said user to select one of said security rules

and to display information describing said selected rule in response to a selection of said one rule

by said user." However, it is then alleged in the Office Action that *Shrader* teaches such features

of claim 1 at column 5, line 38, to column 6, line 34, and column 8, lines 5-18.

The cited sections of *Shrader* appear to disclose various "panes" that are used to display

various information, and the Office Action apparently asserts that at least some of this displayed

information constitutes a "list of security rules." Further, *Shrader* teaches a "ticker tape pane 260"

that "provides the administrator with dynamic, statistical information about the entries and objects

on the page. The information scrolls from right to left and is updated as the administrator initiates

actions on the page." Column 6, lines 1-5. It is apparently the position of the Patent Office that the

updating of the "ticker tape pane 260" as "the administrator initiates actions on the page" could constitute the feature of displaying information describing a "security rule in response to a selection of said one rule from said displayed list," as described by claim 1. Applicants respectfully disagree and assert that there is nothing in *Shrader* to suggest that any of the described "actions" of *Shrader* includes selection of an alleged "security rule" by a user.

In this regard, when the teachings of *Shrader* are properly considered as a whole, it appears that the described "actions" refer to those performed in response to initiation of the displayed pushbuttons, such as those shown in the "display *action* pane 220" and "list *action* pane 250." (Emphasis added). Indeed, in describing the display action pane 220, it is asserted in *Shrader* that this pane "presents *actions* the administrator can initiate by pushbuttons 222." (Emphasis added). Further, the very example given in *Shrader* for updating the "ticker tape pane" is that "on the IP filter page, the ticker tape pane 360 would display the number of filter rules that matched the query and statistics about them." Column 6, lines 5-8. Notably, such a "query" is initiated by a pushbutton, similar to those shown in the display action pane 220 and the list action pane 250. See column 7, lines 58-61.

Thus, the "actions" for which the "ticker tape pane" should be updated apparently refer to those described in *Shrader* as being initiated via pushbuttons, such as those shown in panes 220 and 250. Moreover, although it appears that the "ticker tape pane" could be updated in response to a user initiation of a pushbutton, none of the pushbuttons could arguably be construed as constituting a "security rule," as recited by claim 1. Accordingly, the described updating of the "ticker tape pane" fails to suggest displaying information for describing a selected "security rule" in response to selection of such "security rule," as recited by pending claim 1.

For at least the above reasons, Applicants respectfully assert that the Office Action fails to establish that the combination of *Hayes* and *Shrader* suggests a "security application configured

to... display information describing said selected rule *in response to a selection of said one rule from said displayed list by said user*," as described by claim 1. (Emphasis added). Accordingly, the Office Action fails to establish a *prima facie* case of obviousness with respect to claim 1, and the 35 U.S.C. §103 rejection of this claim should be withdrawn.

Additionally, "(w)hen the patented invention is made by combining known components to achieve a new system, the prior art must provided a suggestion or motivation to make such a combination." *ALCO Standard Corp. v. Tennessee Valley Authority*, 808 F.2d 1490, 1498, 1 U.S.P.Q.2d 1337, 1343 (Fed. Cir. 1986). Moreover, in rejecting claim 1, it is asserted in the Office Action that:

> "It would have been obvious to one of ordinary skill in the art at the time the invention was made for the security application to be configured to enable said user to select one of said security rules and to display information describing said selected rule in response to a selection of said one rule by said user, since Shrader states at column 1, line 6 to column 2, line 2 that such a modification would be an improvement to the user interface, thereby making the interface user friendly by preventing an administrator from writing information down from a plurality of screens."

However, there is no cited deficiency in *Hayes* to motivate one of ordinary skill in the art to seek the alleged benefits described by *Shrader*. In particular, there is nothing to indicate that a user in *Hayes* suffers from having to write "information down from a plurality of screens." Thus, the proffered reasons for combining *Hayes* and *Shrader* are insufficient for establishing a *prima facie* case of obviousness. Indeed, where there is no apparent disadvantage present in a particular prior art reference, then generally there can be no motivation to combine the teaching of another reference with the particular prior art reference. *Winner Int'l Royalty Corp. v. Wang*, 202 F.3d 1340, 1349, 53 U.S.P.Q.2d 1580 (Fed. Cir. 2000). Thus, even if the alleged combination teaches all features of pending claim 1, as alleged in the Office Action, Applicants respectfully assert that the combination of *Hayes* and *Shrader* is improper, and the 35 U.S.C. §103 rejection of claim 1 should be withdrawn for at least this reason.

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Claims 2-7, 19-22, and 24-28

Claims 2-7 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly

unpatentable over *Hayes* in view of *Shrader*. Further, claims 19-22 presently stand rejected in the

Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* in view of *Shrader* and

in further view of *Deo* (U.S. Patent No. 5,720,033). In addition, claims 24-28 have been newly

added via the amendments set forth herein. Applicants submit that the pending dependent claims

2-7, 19-22, and 24-28 contain all features of their respective independent claim 1. Since claim 1

should be allowed, as argued hereinabove, pending dependent claims 2-7, 19-22, and 24-28 should

be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed.

Cir. 1988).

Claim 8

Claim 8 presently stands rejected under 35 U.S.C. §103 as allegedly unpatentable over

Hayes in view of *Shrader*. Claim 8 presently reads as follows:

> 8. A computer system, comprising:
> means for displaying a list of security rules for locking down resources of
> said computer system;
> means for receiving inputs from a user of said computer system;
> means for enabling a set of said security rules based on said inputs from said
> user;
> means for enforcing said enabled set of security rules;
> ***means for selecting one of said security rules from said displayed list***; and
> ***means for displaying information describing said selected rule in***
> ***response to a selection of said one rule by said selecting means***. (Emphasis
> added).

For reasons similar to those set forth hereinabove in the arguments for allowance of claim

1, Applicants respectfully submit that the combination of *Hayes* and *Shrader* fails to

suggest at least the features of claim 8 highlighted above. Accordingly, the 35 U.S.C. §103

rejection of claim 8 is improper and should be withdrawn.

Claim 9

Claim 9 presently stands rejected under 35 U.S.C. §103 as allegedly unpatentable over

Hayes in view of *Shrader*. Claim 9 presently reads as follows:

> 9. A method for locking down resources of computer systems, comprising
> the steps of:
> displaying a list of security rules for locking down resources of a computer
> system;
> receiving inputs from a user of said computer system;
> enabling a set of said security rules based on said inputs from said user;
> enforcing said enabled set of security rules;
> ***selecting one of said security rules from said displayed list***; and
> ***displaying information describing said selected rule in response to said***
> ***selecting step***. (Emphasis added).

For at least the reasons set forth hereinabove in the arguments for allowance of claim 1,

Applicants respectfully assert that the combination of *Hayes* and *Shrader* fails to suggest at

least the features of claim 9 highlighted above. Accordingly, the 35 U.S.C. §103 rejection

of claim 9 should be withdrawn.

Claims 10-18

Claims 10-15 presently stand rejected in the Office Action under 35 U.S.C. §103 as

allegedly unpatentable over *Hayes* in view of *Shrader*. Further, claims 16-18 presently

stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over

Hayes in view of *Shrader* and in further view of *Deo*. Applicants submit that the pending

dependent claims 10-18 contain all features of their respective independent claim 9. Since

claim 9 should be allowed, as argued hereinabove, pending dependent claims 10-18 should

be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600

(Fed. Cir. 1988).

Claim 23

Claim 23 presently stands rejected under 35 U.S.C. §103 as allegedly unpatentable over

Hayes in view of *Shrader*. Claim 23 presently reads as follows:

> 23. A computer-readable medium having a program, the program comprising:
> logic for displaying a list of security rules;
> logic for enabling a set of said security rules, based on inputs from a user;
> logic for causing a computer system to enforce said enabled set of security rules;
> ***logic for enabling a user to make a selection of one of said security rules while said list of security rules, including said one security rule, is being displayed***; and
> ***logic for displaying information describing said selected rule in response to said selection***. (Emphasis added).

For at least the reasons set forth hereinabove in the arguments for allowance of claim 1,

Applicants respectfully assert that the combination of *Hayes* and *Shrader* fails to suggest at

least the features of claim 23 highlighted above. Accordingly, the 35 U.S.C. §103 rejection

of claim 23 should be withdrawn.

CONCLUSION

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,

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